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ABSTRACT

Indicators of the quality of a nontraditional college are difficult to define since the outputs of nontraditional education differ from traditional outputs. This document assesses some of the possible indicators, including accreditation status; state charters, licenses, and approvals; the college catalogue listing of faculty and indication of institutional goals; what to look for at site visits; attrition and placement; accuracy of catalog; faculty organization and participation; student government and organization; and the quality and availability of dissertations. The cumulative impact of each of these factors may be helpful in assessing institutional quality. (MJM)

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THE NON-TRADITIONAL COLLEGE: HOW TO DETERMINE MINIMUM STANDARDS

George E. Arnstein
October 23, 1974

A paper prepared for use at the Conference on Quality Control in Non-Traditional Postsecondary Education, Antioch College, Columbia, Maryland, November 10-12, 1974.

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Participants in the Antioch College conference have been mailed copies of his two articles entitled "Ph.D., Anyone?" and "Bad Apples in Academe," American Education, Volume 10, Numbers 6 & 7, July 1974/ August-September 1974.

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The Non-Traditional College: How to Determine Minimum Standards

George E. Arnstein

Given the fact that there are some 3000 American colleges and universities, and given the further fact that there is a deliberate fostering of diversity and pluralism, it always has been a problem for the prospective student to select a college suitable for him. Today the problem has become more difficult, because the traditional major categories have been blurred, and the varieties of choice are greater, even as the bulk of the colleges may be becoming more homogeneous (as the Newman Committee charged in its first report).1/

In addition to the problem of selecting a college which fits the student's needs -- for example, church-related versus nonreligious -- there is the very real question of educational quality and integrity: How can you tell a phoney operation, a potential diploma mill from a genuine innovation, especially because so many schools today claim to be universities without walls, award external degrees, and generally employ devices which have been blessed by various official and unofficial bodies, including the Federal Fund for the Improvement of Postsecondary Education, the Carnegie Commission on Higher Education, various accrediting bodies and other voices in the educational heartland. (Since American education has no "official spokesman," there is the additional problem of determining who speaks with authority in praising or condemning certain current practices.)

1. The Conventional Wisdom Won't Work.

Traditionally the advice given to high school seniors was to look for accreditation and similar forms of approval to indicate quality. Such indicators may in fact be helpful, but they are mere indicators, not definitive ratings.

1.1. Accreditation

Accredited colleges are presumed to meet quality standards, and nonaccredited colleges. . . .But almost nobody wants to finish that sentence because, except for colleges whose accreditation has been revoked, the proper answer is that accreditation is voluntary, that some colleges have chosen not to apply, that some nonaccredited colleges are good and, besides, regional accreditation is only for nonprofit colleges thus condemning all others, at least by implication. (In fact, the nonprofit rule, so long and arduously litigated in the Marjorie Webster Junior College case, is kind of academic because the Western College Association has for many years accredited profit making colleges. Western, of course, is one of the six regional accreditation bodies which are linked together as the Federation of Regional Accreditating Commissions in Higher Education (FRACHE)).

1/ Report on Higher Education (1971), p. 12

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Even among the members of the club, the accredited colleges, there is tremendous diversity and always has been: No reasonable person claims that typical Goddard graduate sought to learn what the typical UCLA graduate sought, and both of them will differ from the product of a respectable teacher college. But all of them may well be accredited and their graduates will equally be admitted to certain examinations of the United States Civil Service Commission which requires a bona fide college degree, i.e., from an accredited college or some equivalency or derivation thereof.

These colleges are proud of their differences, of their variations in emphases, in curricula, standards for admissions, and standards for graduation. A bachelor's degree per se, is no assurance of quality or performance or equivalence.

Accreditation stands for many things, possibly including the integrity of the faculty, the leadership of the administrators, the probity of the trustees, and the solvency of the balance sheet but not dependably and reliably as a criterion of performance, either by faculty or students.

Worse yet, graduation from an accredited college or even from an accredited specialized course of study typically does not admit the law graduate to the practice of law, the new teacher to certification, or the medicinae doctor to the practice of medicine. (Doctors of Philosophy, on the other hand, are presumed competent to teach whenever they land a job as acting assistant professors.)

In summary, the traditional college does many things well, has satisfied thousands of students, engenered few demands for a refund on the grounds of malfeasance or nonfeasance, but it did not necessarily control quality, even through the faculty and the grade point averages can be invoked as indicators of quality.

1.2. State Charters, Licenses, and Approvals

State licensing laws are so uneven, so weak, so lax, that the United States Office of Education has been putting out a warning for years not to rely on them. There are some efforts* afoot to change this, to help the States do a better job of licensing, but for now the State license is not a meaningful indicator of honesty, quality, or viability.

Matters are so bad that various Federal agencies operate separate and sometimes competitive systems to determine eligibility, with the leading place taken by the State Approving Agencies, sponsored by the Federal Veterans Administration. With an annual subsidy of about $10 million from the Veterans Administration these State officials are supposed to go out and review every course offered in a given State and then to determine whether it should be approved for veterans under the G.I. Bill. Without describing the system in detail, and without mentioning all of the improvements which have been made over a period of two decades, the fact remains that the Federal Trade Commission has issued this warning:

*cf. The proposed model licensing law of the Education Commission of the States.

> ". . .Veterans Administration does not approve schools. Under the G.I. Bill, a State Approving Agency approves courses for veterans' training. . . .Such approval does not necessarily mean that the course offers quality training."

Since the Federal Trade Commission has jurisdiction only for profit seeking businesses, the warning is aimed at proprietary vocational and technical schools, but it could also be extended to colleges because the same State staff, the same funds, the same regulations apply to approval of courses in higher education.

In short, schools which have their State license revoked, or which do not get one in the first place, probably are substandard. Similarly, if a school cannot get its courses approved for veterans, this may be an indicator of major defects. But a license or approval is not necessarily a positive indicator.

More or less the same thing is true for all of the other things some schools have been known to put on the front of their catalogs or at the bottom of advertisements:

"Approved by the Immigration and Naturalization Service"

"Recognized by the United States Department of Justice"

"Eligible for the Guaranteed Student Loan Program"

"Member of the XYZ Association of Colleges"

In summary, about all that can be said of such claims is that, if true, it is better to have the various approvals and eligibilites than not. Each citation means that the school has survived some form of scrutiny, superficial as this scrutiny may be. Regrettably some of the claims are false and there is very little enforcement or prosecution for false claims.

One nonaccredited law school falsely invoked recognition by the United States Department of Justice; its reward was that a former United States Commissioner of Education delivered the graduation speech a year later. (The causal relationship here implied may be an example of the most famous fallacy of them all: Post hoc, ergo propter hoc.)

1.3. The College Catalog

That college catalogs read like works of fiction is one of the standing (feeble) jokes in higher education. They list faculty members despite the fact that they are on leave, and the goals of education usually are interchangeable in the promise of liberal arts, professional competence, and enlarging the minds of students. Libraries are always well stocked and cultural activities seem to be be omnipresent.

Despite this well-known puffery, despite the glossy photographs of ivy-covered walls, the catalogs of the more experimental and nontraditional colleges tend to be rather explicit in emphasizing their differences. Here is what a young research assistant reported after a sampling of catalogs:

> "It seems that the experimental colleges are very open about their innovations; the University Without Walls is becoming popular, almost faddish. Many public universities have UWW programs, but I could not find any details about them. As the UWW idea grows, the established experimental colleges such as Bard and Antioch seem rather conservative, with their core classes and established programs of study.
>
> "When looking for 'accreditation' in tables of contents of various catalogs, two of them (apparently unaccredited -- I could find no mention of accreditation anywhere) had no table of contents but rather artsy catalogs, with pages inverted or backwards for some effect other than efficiency." 2/

College catalogs, in short, can provide helpful clues, but they are not reliable indicators as to quality. If the Newman recommendations go into effect, there may emerge catalogs with some of the qualities of a full disclosure prospectus, and this will be helpful. Too often the catalog today reads like this opening passage from a college visited last year:

> "The primary educational objective of [ABC College] is to provide a baccalaureate curriculum distinguished by academic excellence."

It is my contention that this sentence could be attributed to the overwhelming majority of all American colleges. Even the second sentence does not change this very much:

> "Particular attention is given to teacher preparation; pursuant to the goal of academic excellence, every effort is made to combine a strong liberal arts approach with this professional emphasis."

In summary, college catalogs can be helpful; they are not reliable as sources of information or as indicators of quality.

2. Use of Site Visits

Traditional advice to students and their parents has been to suggest a visit to the campus of their prospective choice. The advice is sound but not always easy to carry out.

If the college is traditional, the visitors pretty well know what to expect and the visit is designed to help them get the "feel" of the college. If the college is nontraditional, the questions have to be more probing, verging on the investigative, and may cause some resentment.

2/ Kimberly Krekel, Internal Memorandum, August 29, 1974, Based on a sampling of College Catalogs.

An applicant probably would have to visit half a dozen schools before making a decision, and this is not very efficient. Further, he would have to know which questions are relevant, which answers are meaningful, and my own visit to the University of Blank 3/ indicates some shortcomings of my own as to which questions to ask -- and what to do with the answers. The fact remains that a site visit is helpful and time-consuming.

For the schools so visited, the problem also is that the process is wasteful, especially because I rate candor and full disclosure and openness as positive indicators of quality. These open qualities, to me, indicate that the school is proud of what it is doing. They reflect enthusiasm and other positive values. But openness takes time, whether the questions are answered by a college administrator or a student on the college work-study program. If we add interviews with a sample of the faculty, and a sampling of students and graduates, the whole matter is likely to get out of hand.

It was the advertising for Packard automobiles which used to advise prospective purchasers to "Ask the Man Who Owns One," and it certainly is helpful to talk to present and past students of a college as to their satisfaction. For new and innovative colleges, this obviously is less helpful, because often they have no alumni as yet, and the first year "formula" may well be changed by the time the next cohort of freshmen arrive on the scene.

3. Indicators of Quality

There are, however, some indicators of quality which almost certainly are relevant. In listing and discussing them there is the concomitant realization that these indicators should be validated, that we need a more systematic effort to determine which of these indicators truly indicate, and which ones may or should be discarded. In other words, the social scientist in me calls for the usual "additional research."

Here is what I would look for in site visits to a campus:

3.1. Accuracy of Catalog

If the college claims to be approved by the Veterans Administration, the claim is false (at least technically) because the Veterans Administration approves no domestic colleges, leaving the approval to the State approving agencies. By itself this kind of sloppiness (or deceit) may not be important; cumulatively these types of errors or omissions may be informative.

Some college catalogs list no faculty members at all, and this also may offer a clue as to the esteem in which the college holds one of its human resources. If the faculty roster lists only names and no degrees, or degrees without the name of the awarding university, the question arises as to why there is this lack of precision. I am thinking specifically of the California law school which claims to award no doctorates,

but lists the president as Dr. First and Last Name, Ph.D. As a prospective student I would have found it illuminating that the law school did, in fact, award the doctorate to its own president; unfortunately there is no ready way to learn of this.

Claims as to accreditation and other approvals may be revealing. The major universities often do not bother to list these various kudos, or list them in relatively obscure places; less prestigious schools tend to put them near the title page (which is entirely appropriate).

"Accreditation" by itself is meaningless. The question is who awarded the accreditation and is that body itself legitimate, i.e., is it recognized either by the United States Commissioner of Education or the National Commission on Accrediting (a private organization)? Keep in mind that three of us (with a lawyer) could create our own accrediting body tomorrow morning and then set out to accredit all kinds of schools. That, in fact, is what the sponsors of the spurious National Educational Accrediting Association did until they had to give it up under a court order. Meanwhile its accredited schools told the world that they were accredited, or if you prefer, "fully accredited."

In summary: Accuracy is helpful.

3.2. Full Disclosure

This probably should be done in the catalog, but any other widely available document will do. Does it cite all charges or does it omit references to graduation fees, locker fees, library fees? Ideally it should include library fines and similar details so as to prevent surprises. Does it disclose refund policies? Does it discuss the library and even library hours and schedule? Does it list the faculty, indicate which ones will be on leave, indicate their degrees, their university, and, ideally, even the year the highest degree was awarded? Does it show who will teach which course?

Does it describe policies as to residential requirements, dormitory costs (and restrictions), and other housing data? Alternatively, does it flatly say that housing is the student's own responsibility?

3.3. Statement of Goals

To the extent that American colleges are part of a pluralistic system, they may differ widely in their goals. The California College of Arts and Crafts (where I taught at one time) should have a statement of goals and objectives which clearly differs from the Curtis Institute of Music, from Caltech, or from the University of California at Berkeley.

The newer and more innovative a college is, the more important it is for its statement of goals and objectives to be as explicit as possible. Can you tell from the college catalog what the unique or distinctive features are? Can you visualize actual learning methods and procedures? If it is "normal" at a college to take the Junior Year abroad, does it so indicate (and mention the cost differential), and does it list the affiliated or cooperating campuses or arrangements abroad?

Is the emphasis on tutorials, on individual study, on seminars, on field trips, on credit for life experience? All of these things should be described with sufficient precision so that the student can visualize what is in store for him, whether he will find it satisfactory, and whether this is the type of education he truly wants.

3.4. Attrition and Placement

The Federal Trade Commission currently is holding hearings on a proposed rule which calls for disclosure (by proprietary schools, the only ones over which the FTC has jurisdiction) of such things as attrition rates and job placement.

Increasing pressures are building for colleges to publish similar data, even though there are presently no criteria for common data systems or comparability.

Since colleges differ in their goals, there may be major differences in their performance. If a college promises to teach the student about truth, beauty, and the wisdom of the past, then it probably does not promise vocational preparation and it may be ridiculous to ask how many of the graduates found jobs pursuing truth, beauty or wisdom (occupations which pay badly and are difficult to find or classify). But if a college enrolls you in teacher preparation, law, or some other profession, should it then be assumed to have responsibility for job placement? Or could the college be said to have done its job if the future teacher is credentialed by the State, or the future lawyer passes the bar examination, even if he then remains unemployed?

Questions about retention rates and job placement (or passing of licensing examinations) are legitimate. The answers are likely to be unsatisfactory, in part because colleges are not used to having anybody ask them, thus are not really equipped to disclose the data.

In summary: Does the product (the graduate) stand the test of time? (The question tends to discriminate against new colleges and new curricula.)

3.5. Traditional Indicators

The various accrediting bodies differ in their criteria, their procedures, and the checklists they use. They have been strong in their inspection of input measures. Today's trend is toward output measures which, unfortunately, are much more difficult to use.

Input measures, to put it simply, are those tools and techniques used toward the making of a graduate: Number of credits, number of books in the library (and the concentration and relevance), number of Ph.D.'s on the faculty, student-faculty ratios, facilities for physical education, even fire and safety standards. These (and others) make sense, give an indication of quality, and, presumably, make it possible for a teacher to teach and a student to learn.

Output measures seek to determine whether the student has learned anything, whether he has acquired certain competencies (and this explains such concepts as competency-based education, performance-based criteria, and variations thereof). At least in theory, it does not matter whether a student learned Spanish as a native tongue, or whether he learned it in his Junior Year in Madrid, or through four years of classroom exercises and language laboratories: If he passed a test measuring his competence, he obviously knew more than if he failed it. The same can be said for the skilled automobile mechanic and whatever the standards are at the completion of Calculus I or for a pilot's license.

Output measures are much more difficult to apply in the affective domain, even in the liberal arts, because there is no agreement as to what a competent liberal arts graduate is supposed to know. Since traditional colleges tended to speak of truth, wisdom, and beauty, output measures were just about impossible to apply and the licensing teams and accrediting bodies relied heavily on input measures. Placement rates are an example of output measures.

Nontraditional colleges face the same dilemma. If they emphasize manual skills or certain measurable objectives, they can turn to output measures: either you can back into a parking space or you cannot; either you can speak fluent French or you cannot. But how do you measure personal fulfillment and growth, and who is to establish objective criteria as to the affective domain?

Unfortunately it is easier to count the books in the library or the advanced degrees held by the faculty than it is to assess the growth of faculty or students; that is why many colleges publish annual or quarterly reports in which they count and cite the publications of the faculty, the prizes won by students, and the gold medals won by the cows which were raised in the College of Agriculture's experiment station.

These are meaningful indicators and it makes sense to look for them. Some colleges are unwilling to publish such data and the unwillingness also may be informative.

Just for the record, here are some of the things I would look for:

(a) Faculty Organization and Participation.

(b) Student Government and Organization. (West Point is an accredited four-year college; it appears to be a good deal more authoritarian than most American colleges. What I consider important is whether you can tell, or not, so that you can then make your own decision in the light of your own preferences.)

(c) Student Theses and Dissertations. Can you find them in the library and what do they tell you about the quality of the work? If they are inaccessible, this too may be informative.

(d) Truth in Catalog. Do the pictures and the narrative of the catalog correspond to the campus,

(e) And, finally, just to test limits, you might ask for the most recent accreditation report, almost universally treated as a confidential document. In fact, most accrediting bodies specify that they do not care, that they send the report to the chief executive officer of the school (normally the president) and that he is free to share it with whomever he wishes.

(If you do get to see it, the most important parts are whether accreditation was granted (or renewed), whether there were stipulations (i.e., conditions which had to be met or accreditation might be revoked), and thus discovery of the strong and weak points of the college, as determined by the accrediting commision whose criteria might be quite different from yours.)

4. Inconclusive Conclusions

In informal conversations we speak of first-rate colleges, and third-rate colleges, but most of us would be hard pressed to explain with precision what we mean by the distinction. My first college teaching job was at the California College of Arts and Crafts, a first-rate college (in my opinion, based on data from the early 1950's) for artists, graphic arts, and teachers of these and related subjects, but a third-rate college for social science. Since the college only offered the Bachelor of Fine Arts and did not offer a B.A. or B.S., this is hardly an insult or a put-down.

In fact, it may be safe to assert that the more traditional a college is, the more certainly we can assign it some form of quality rating, especially if this rating is related to a statement of goals and objectives.

A nontraditional college obviously is more difficult to rate, but there it becomes even more important to look for qualities of openness and full disclosure. The use of the data unfortunately requires rather sophisticated skills which we should not reasonably expect from students, from their parents, and not even from high school guidance counselors to whom we habitually refer queries of this type.

The same is true for site visits which become increasingly meaningful if you are a specialist in. . . .well, a specialist in site visits.

My conclusion, then, is that there are few reliable conclusions to be drawn from site visits, catalogs, and that the approvals of third parties are less than persuasive. Conversely, the cumulative impact of these various indicators of quality ought to be helpful. Further, as colleges compete increasingly for students, become more responsive to the concepts of consumer protection, full disclosure, and accountability, it should be possible for them to communicate their true goals and objectives, their accomplishments, and thus enable them to attract the kinds of students who will be most interested in the specialized programs offered by a specialized college.

5. The Real Conclusion

The original intent of this paper was to examine the assurances as to how a college upholds minimum standards "of the kind intended." The conclusion, for better or for worse, is that the assurances are pretty weak, that the standards of necessity will vary with the intent (goals, objectives), and that the uncertainty increases proportionally as the college becomes more innovative or nontraditional because its old "output" is no longer relevant as an indicator of quality or standards.

If there are no such assurances, then the next question obviously is whether we can do something to move toward them, and here the answer is more positive, with heavy emphasis on full and meaningful disclosure by the college. Special emphasis should be on goals and objectives -- the kind of education intended, to use the words of the Conference Plan -- because standards are meaningful only to the extent that they are related to the goals.

Between full disclosure and a skeptical site visit, the standards of the college should become increasingly visible, thus providing increasing assurances that education of the kind intended actually is being attained. This is especially true for those colleges which are proud of their objectives, thus are more likely to be willing to display them fully and openly. Thus the single most important criterion -- in my view -- is the candor and openness of the college.

Some day, if various gatekeeping agencies attain a greater measure of professional competence and integrity, it may become possible to rely on such outside evaluation, but given the present state of the art I place no reliance on either accreditation, or licensing, or any other form of approval, although cumulatively the presence or absence of these and other indicators may warrant the drawing of some limited conclusions.

Finally, CAVEAT EMPTOR.

encl: Appendix I

The Non-Traditional College:
How to Determine Minimum Standards

George E. Arnstein

APPENDIX I

The following account has been edited from the internal report I prepared after a site visit, but only to delete names. My draft report was sent to the president of the university for his review and comment. He didn't like it, in part because of the inquisitorial overtones of some of the questions.

Visit to the University of "Blank"
Is It a Diploma Mill? 4/

The University of "Blank" describes itself as an innovative, nonresidential university without walls, operating out of a small office in suburban Blank, and without recognition from the educational establishment. It is almost two years old and its future is in doubt.

Its president, Mr. A., is an outspoken man who emphasizes that he is looking for adult students -- mature adults, that is, often age 40 or 50, although nobody is turned away because of age.

"We require a high school diploma," he says, "and we put a good deal of emphasis on the liberal arts by requiring some 60 quarter hours, plus 40 hours in the student's major field, 16 hours in his minor, thus leaving some 64 hours of electives, for a total of 180 quarter units."

Since many of the students have attended college before, often with a scattered collection of credits, the University of Blank allows up to 16 credits for work experience, and some 48 maximum credits for work which might not normally be considered as collegiate. This is because the students are mature, says President A., and typically have accumulated a good deal of knowledge by taking a company-sponsored course or two, or have attended a special workshop. The University tries to evaluate this kind of education; it then allows credit for it.

"Let's face it," says A., "They [the students] come to us because they need the degree." He then cites the regional manager of a chain of stores, the head of a local reform school, and nurses, "lots of nurses, because they only have three years of nursing school and they want that fourth year and a degree."

4/ A slightly different version appears as an appendix in Private Accreditation and Public Eligibility by Harold Orlans, N. Jean Levin, Elizabeth K. Bauer, and George E. Arnstein, a study conducted under an Office of Education contract with the Brookings Institution and the National Academy of Public Administration Foundation, Wasl gton, D. C., 1974.

The University, whose slogan is "The World is Our Campus," seeks an individual approach in which students are not regimented, where the setting is noncompetitive through individual study, and where all of this is possible because students do not attend classes. A. realizes the implied contradiction when he says that there is no set length of time for each course; since this tends to let students drift, there is now a three month standard for each course, but this can be lengthened by request.

The University of Blank is in trouble because it currently has only 140 active students. It has some 300 applicants who are ready to start but who are awaiting some kind of verdict as to the University's legitimacy. Not that A. would use a word like "legitimacy." He does admit there is a cloud over Blank's future, for how does one establish credibility for a new and innovative institution when things seem to be stacked against it?

His account goes something like this -- and his candor is noteworthy:

The University began operations in February 1971 under a State nonprofit charter. In March some 31 students arrived, having paid a $20 evaluation fee plus $20 for each undergraduate quarter hour. The University promptly applied to the State Association of Colleges and Universities, which, in due time, sent a team which visited a whole day but never rendered a verdict. (Membership in the Association, however, was turned down.) An application to the State Association of Registrars and College Admissions Officers also was rejected.

In June 1971 the University of Blank applied to the Regional Association of Colleges and Schools only to encounter all kinds of delay.

About this time A. was advised to try for accreditation through the National Home Study Council or the Accrediting Commission for Business Schools. This he chose not to do because, in his words, "We didn't want second-rate accreditation; we wanted to be recognized by the [Regional] Association as an innovative university without walls." A. also volunteered that he is the former owner (and founder) of a private business and technical school, [Point Blank] College which he sold in 1967. (ACBS says flatly: "Never heard of them.")

[Comment by President A. "I do not 'claim' -- I <u>am</u> the founder and previous owner of [Blank] College. I did not apply for membership in the Accrediting Commission for Business Schools mainly because of their exorbitant fees and, at that time, there was little value to membership therein. I was accepted by the State Approval Agency for Private Schools and. . .[t]hat was enough. The ACBS may not have heard of us, but the other agencies have."

The Regional Association sent the University of Blank materials for a self-study and, on January 25, 1972, sent a visiting team. The report of that visit (which A. offered to show me, but then was unable to find in the files) he summarized as having some good things to say--like the dedication of the faculty, and the attitude of the students-- and some

negative things like the lack of a library, and objections to having A. serve both as president and chairman of the trustees. These, and other shortcomings, were obstacles to achieving preaccreditation status by the Regional Association (which is a normal step prior to accreditation, without, however, predicting or implying that accreditation will follow).

The University of Blank then proceeded to deal with some of these obstacles. It established or reestablished its board of trustees; it sought to upgrade itself, received the necessary tax-exemption letter from the Internal Revenue Service, sought and received the required three letters from accredited universities that they would accept credits on transfer from the University of Blank.

As of early December 1972, the Regional Association had rendered no decision as to acceptance or rejection of preaccreditation status which carries with it a limited amount of recognition and status.

A., in the meantime, went to Washington, to confer with officials at the United States Office of Education, since the Commissioner is charged with maintaining a list of institutions or associations which he deems to be meeting suitable standards. A. feels that USOE ought to give him some kind of recognition so that he, in turn, can assure or reassure students. A. left Washington with the impression that Sidney Marland, then Commissioner of Education, had promised him that he would send some official to visit his campus and to check out the situation.

(When I telephoned A., at the suggestion of John Proffitt of the United States Office of Education, Office of Accreditation and Institutional Eligibility, A. thought I was the heralded messenger promised by Marland. To counteract this, I handed him on arrival a prepared one-page fact sheet on Brookings Institution letterhead describing the purpose of our study and verbally reinforced the nature of the inquiry.)

With the private associations rebuffing the new University, and with no action from the United States Office of Education to help establish its credibility, there remained the charter issued by the State. It so happens that the State has been a haven for diploma mills and A. knows it. He explains that it is an unfortunate coincidence that his university without walls happens to be in a State where it might be mistaken for a degree mill. He also admits that the University of Blank attempted a doctoral program but dropped it in favor of concentrating on bachelor's programs plus a master's, primarily in marketing and administration. (The updated current Bulletin emphasizes Associate and Bachelor degrees rather than graduate work.)

The State, to overcome its hospitality to diploma mills, enacted a 1971 law which established new minimum standards administered through a new Board of Independent Colleges and Universities. Executive Director of the Board is Dr. F., who explained that the State now requires a license in addition to a charter, that the Board has so far dealt with more than 400 applications for licenses, that some colleges are still operating under the old charter, others are operating under a temporary license.

The University of Blank took a look at the new law. President A. noted that all accredited institutions are exempt; they do not require a license. Lacking accreditation, this was of no help to him. Next, he noted that also exempt were institutions which qualified under the three-letter rule. So he sough exemption under this rule only to learn from a news story in the local daily, in June 25, 1972, that his application had been turned down on June 22nd. (The State has a rule which requires meetings of public bodies to be open to the public. If a reporter is present at the meeting, obviously he will have immediate knowledge of all decisions, thus a news story may well precede direct notification of the applicant.) A. continues to be unhappy with the news story because he says this attacks the credibility of his University and causes students to stay away. He can't even qualify for State approval for veterans because the Veterans Administration, by law, requires two years of actual operation and the University of Blank is not yet two years old.

A. also is unhappy with the Board because he did not know that the three-letter rule had been abolished. According to a spokesman for the Board, the rule had never been used, no exemption from licensing had been granted by the Board during its organizational stage, and the legislature has now changed the law to eliminate this form of exemption entirely. Institutions which had sought exemption under the three-letter rule are, of course, free to seek accreditation (and thus achieve exemption) or apply for a license.

The University of Blank has done so, has been told what it must do to complete its application, and is facing delay because one of the requirements is a financial statement. As A. put it, this was a time-consuming business and the certified financial audit was completed only "last week." (The date of our meeting was December 5, 1972.) Also, speaking frankly, he says that the financial picture is not too good because the lack of license and accreditation and approval for veterans keeps away students and income.

The University's Bulletin says that the nonprofit university depends for its income on endowments, grants, contributions and tuition payments. Reports A.: No grants, no contributions, but about $5,000 in endowments. This has been spent and he seemed surprised that anyone would expect an endowment to be invested in order to produce income.

[Comment by President A.: "You know the $5,000 were not actually endowments, but contributions, even though the words were used interchangeably from time to time."]

Other available funds, he volunteered, have been a loan of $10,000 that he made, and another $10,000 from others, including $5,000 from a student. He saw nothing wrong with this and seemed surprised that this might have some similarities with the purchase of degrees, especially if the loan were to be forfeited.

The student who made the loan, he explained, is a 68-year-old woman who is also a member of the board of trustees. "Why just last week she returned from her summer home in Michigan," says Mr. G., listed in

the catalog as Director, Academic Affairs. "She called me and she is ready to start again. She wants to take a course in medieval history from me and we are ready to start."

What qualifications does he have to teach medieval history? "Well, I'm not really qualified for that, even though I have a master's in political science from the University of Connecticut. But I use this very good text from McGraw-Hill [he named the title], maybe you know it. It is a part of a series and provides a very good overview so she will get a good idea of the middle ages. She is very enthusiastic."

G. goes on to display a letter of excerpts from satisfied students. One is from Mr. L., the head of a municipal institution who needed a bachelor's degree to hold his job. He is so pleased that he is planning to go for his master's program. His file, pulled at my request, turns out to be a disaster.

The University of Blank allowed him 176 credit hours for military service "life experience" plus courses taken elsewhere; he had to take 16 additional credit hours at University of Blank. ("We used to require 192 quarter hours," said A., "but now only require 180. It's a lot of work to convert semester hours into quarter hours.") Mr. L. may have gone to all the schools claimed by A., but the file does not disclose more than about 76 units, plus three units from the Parish Education of the American Lutheran Church, and another three units from an accredited institution in the State.

A. explains that Mr. L. was one of the first students, that record keeping was bad, that the example is atypical. Mr. L. knows about the inadequate records but he is a satisfied customer. He allows the University to quote him to this effect, says he found the courses very convenient because he could study according to his schedule instead of going to scheduled classes which might be interrupted by an emergency on the job. "It is not a correspondence school, you know; I enjoyed it and I knew it was not fully accredited."

Mr. L. managed to mention that a degree is useful now that he supervises three facilities and has some Ph.D.'s on his staff. He added that he attended several colleges but "you know, they never did send all of those transcripts but I must have taken between 90 and a hundred units. At the time I wanted to become a coach."

His satisfaction was obvious and there was a tacit admission that his happiness was related to the degree he now has but didn't need 22 years ago when he started out on his present job. He was not surprised that I have had access to his records. For that matter, neither A. nor G. even raised any question or warning about the ethics of showing me the files. This can be taken as evidence that they have nothing to hide; it also can be taken as lack of professional standards in failing to safeguard student personnel records. [Comment by President A. "I made the. . . records available to you because you continually emphasized John Proffitt's name, and I felt that concealing anything, good or bad, would add to your very apparent doubts. You even admitted to us here that, after reviewing

other colleges, your skepticism concerning the standards of such places was increasing."]

A. suggested we look at Mr. C., whose case is a good example. He was admitted in June 1972. His letter of admission says he is typical of students who have lots and lots of credits from different schools, more than the numerical total required, that the University of Blank will award him a B.S. if he takes the required 24 units to round out his education. However, the University will waive the 24 units required and settle for 14 units, provided he signs up for another 45 quarter units for a Master of Science degree at the University of Blank. The letter is signed by G.

Why the tie-in between bachelor's and master's? I fear that my surprise was highly visible and I did not maintain my role of detached interviewer/observer. I wanted to suggest that this kind of tie-in smacked of money-grabbing; I never got the chance because G. reacted immediately by agreeing with the tone of my question. "That's wrong," he said. He did not seem to recall that he had signed the letter, then quickly explained that the decision was made by an admissions person "who is no longer with us." A., on the other hand, saw nothing wrong with the letter. "That's one of our rules" and he thought it was a good rule. When pressed, he said that he thought a bachelor's degree ought to precede a master's degree, and while this might not be necessary, "we were innovative enough" in other areas without taking on this additional burden.

A. suggested another "good example," Mrs. Z. The file shows a very recent undated letter admitting her, giving her credit for some three years of prior education, and spelling out the remaining courses to be taken. Mrs. Z. is a registered nurse and there is a photocopy of a transcript, signed by Sister T. There also is a simple unsigned notification from a community college that Mrs. Z. has taken 7 units in a nursing related course.

How does the University know that these transcripts are trustworthy? "Good question," said A. What happens is that the University of Blank accepts these informal documents for the time being while the students write to the school to secure official transcripts.

Mrs. Z.'s letter of admission, on the other hand, has nothing tentative or conditional about it; it flatly states that the University has evaluated the records submitted and is giving credit for them.

Also missing is any evidence to link the transcript which is in one name, presumably the maiden name, to the letter of admission which is in Mrs. Z.'s married name; first name seems to check out (it is something common like "Mary"), and the middle initial coincides with the maiden name. Still, there is no proof and neither G. nor A. seem even to have considered this as a problem. [Comment by President A. "What right have you to say the transcript may or may not be authentic regarding Mrs. Z.'s transcript unless you are deliberately attempting to establish doubt."]

Again, they conceded that the two files are not in good shape, that the students and their performance were really better than the files might

indicate. After all, this university without walls emphasizes a "one-on-one" relationship between faculty and students.

"No, there are no entrance examinations."

"Yes, we do require a high school degree."

"Yes, students can apply by mail; there is no required interview. If students do come in person, we get information to make an evaluation and probe what he wants to major in. Leading choices are a major in marketing management, next psychology and sociology which seem to fit in for a lot of the nurses."

Then came an odd assertion: "Some of our students get their fees reimbursed by their employers. For example, NASA, the Naval Training Base." "The United States Naval Station?" "Federal Funds?" "Yes, also Florida Power, Montgomery Ward, Westinghouse. . . .," says A.

The Bulletin also lists a large cluster of courses in Christian Education, Religion, and The Bible; these, according to A., are dormant. Also listed in the Bulletin, which isn't pretentious and makes no extravagent claims, is a faculty which is not distinguished by advanced degrees or strong on academic accomplishments, but makes some claim to business and religious competence.

Neither A. nor the Bulletin claims to be strong on counseling or advising students; on the contrary, the Bulletin speaks of a program designed for "the highly motivated, mature person who CAN and WILL organize his time and energy to meet the high standards of TODAY'S university."

While the University of Blank is without walls, it does have a house organ which features a photograph of a large office building but neglects mention of the fact that the University was merely a tenant. It has now moved to the suburbs where there is one large cheerful room shared by President A., Academic Director G., a secretary, a duplicating machine, a coffee machine, and architectural drawings for a new suite of offices. [Comment by President A. "Was it your intent to discredit us by the amount of 'concrete' space or what we were doing academically? What has the coffee pot to do with the allegedly objective investigation of yours into the academic quality of this university? Our concept is that of a 'university without walls,' a concept that is being increasingly accepted as a most practical approach to higher education."]

The University of Blank has awarded 18 baccalaureate degrees, 7 masters, and one associate. A., not incidentally, claims a bachelor's of science degree from Florida Southern College; he started graduate work in economics but "I didn't make it." Apparently he has not been awarded any degree by the school he has founded; that's a good sign in my book, but it does not prove anything. [Comment by President A. "I do not 'claim' a bachelor's degree. . .I have [one]. I began a master's program, but I left it because of personal reasons, not because 'didn't [or couldn't] make it.'"]

Tomorrow, says A., he is off to talk merger but does not want to tell me with whom because two previous sets of negotiations have fallen through. "Our merger partner already has a self-study (i.e., independent study) program and the University of Blank may disappear altogether."